

Judge Karen L. Strombom

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOANNA OLSON,

Defendant.

NO. *MT15-5150*

COMPLAINT

18 U.S.C. §§ 2251(a) and (e); 2252
(a)(4)(B) and (b)(2)

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BEFORE, Karen L. Strombom, United States Magistrate Judge, U. S. Courthouse,
Tacoma, Washington.

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COUNT 1
(Production of Child Pornography)

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On a date unknown, but no later than on or about August 26, 2015, in Longview,
within the Western District of Washington, and elsewhere, JOANNA OLSON did
knowingly employ, use, persuade, induce, entice, or coerce, and attempt to employ, use,
persuade, induce, entice, or coerce, a minor to engage in sexually explicit conduct for the
purpose of producing a visual depiction of such conduct, using materials that had been
mailed, shipped, and transported in and affecting interstate and foreign commerce by any

1 means, including by computer, and the visual depiction was transported using any means
2 and facility of interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 2251(a) and (e).

4 **COUNT 2**
5 **(Possession of Child Pornography)**

6 Beginning at a time unknown and continuing until August 26, 2015, at Longview,
7 within the Western District of Washington, and elsewhere, JOANNA OLSON did
8 knowingly possess matter that contained visual depictions the production of which
9 involved the use of minors engaging in sexually explicit conduct, and the visual
10 depictions were of such conduct, that had been mailed and shipped and transported in and
11 affecting interstate and foreign commerce by any means, including by computer, and
12 which had been produced using materials that had been mailed and shipped and
13 transported in and affecting interstate and foreign commerce by any means, including by
14 computer, and the images of child pornography involved include images of a
15 prepubescent minor and a minor who had not attained 12 years of age.

16 All in violation of Title 18, United State Code, Section 2252(a)(4) and 2252(b)(2).
17

18 And the complainant states that this Complaint is based on the following
19 information:

20 I, Special Agent Samuel Mautz, being duly sworn under oath, depose and say:

21 **INTRODUCTION**

22 1. I have been employed as a Special Agent of the FBI since 2011, and am
23 currently assigned to the Vancouver, Washington Resident Agency of the Seattle,
24 Washington Division. Previously I was assigned to the Pierre, South Dakota Resident
25 Agency of the Minneapolis, Minnesota Division. While employed by the FBI, I have
26 investigated federal criminal violations related to high technology or cyber crime, child
27 exploitation, and child pornography. I have gained experience through training at the
28 FBI Academy in Quantico, VA as well as training to be a Digital Extraction Technician

1 for the FBI and everyday work relating to conducting these types of investigations.
2 While assigned to the Pierre, South Dakota Resident Agency, I conducted investigations
3 in conjunction with the South Dakota Internet Crimes Against Children Task Force. I
4 have received training in the area of child pornography and child exploitation, and have
5 had the opportunity to observe and review numerous examples of child pornography (as
6 defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover,
7 I am a federal law enforcement officer who is engaged in enforcing the criminal laws,
8 including 18 U.S.C. §§ 2251 and 2252A, and I am authorized by the Attorney General to
9 request a search warrant.

10 2. The facts set forth in this Complaint are based on my own personal
11 knowledge; knowledge obtained from other individuals during my participation in this
12 investigation, including other law enforcement officers; review of documents and records
13 related to this investigation; communications with others who have personal knowledge
14 of the events and circumstances described herein; and information gained through my
15 training and experience.

16 3. As further detailed below, based on my investigation and the investigation
17 of other law enforcement officers, I submit there is probable cause to believe that
18 JOANNA OLSON has committed the violations described above. In particular, the
19 investigation has uncovered substantial evidence that JOANNA OLSON produced child
20 pornography on a date unknown but between July 1, 2015 and August 26, 2015, and
21 possessed child pornography continuing until on or about August 26, 2015.

22 CASE SUMMARY

23 4. On or about August 16, 2015, a law enforcement officer operating in an
24 online covert capacity, hereinafter "online covert employee (OCE)", with the
25 Washington D.C. Field Office of the FBI, posted an ad on the KIK ME section of a web
26 site that caters to people with fetishes including incest and sex with children. On August
27 17, 2015, a user with the username "Black_poppabear_SD" responded to the ad through
28 the KIK messenger. Kik Messenger or Kik is an instant messaging application for

1 mobile devices from Kik Interactive. Kik uses a smartphone's data plan or Wi-Fi to
2 transmit and receive messages. Kik also allows users to share photos, videos, sketches,
3 mobile webpages, and other content. Kik Messenger requires users to register a
4 username.

5 5. I have reviewed a report of the KIK chat that occurred between the OCE
6 and the user with the username Black_poppabear_SD. The chat began on August 17,
7 2015 with the following:

8 Black_poppabear_SD: Active dad here

9 OCE: Same here how old is your lil one ?

10 Black_poppabear_SD: 3g

11 OCE: Very nice mine is 9 and active

12 OCE: I'm in the DC va area 30 here you ?

13 OCE: Mine is g too

14 Black_poppabear_SD: Sweet

15 Black_poppabear_SD: 39 San diego

16 Black_poppabear_SD: How did your start her

17 OCE: How far have you gone? Started out licking and Cummings on her during
18 diaper changed and bath

19 Black_poppabear_SD: Can she take you fully

20 Black_poppabear_SD: Does the mother know

21 OCE: Mom has no clue and not fully yet, mostly get her to suck and jerk me but
22 do rub my head in her pussy

23 OCE: I miss the younger days . Yours with you now ? Ever take any special pics
24 of her

25 Black_poppabear_SD: No and yes

26 OCE: Cool

27 OCE: Mine too

1 Black_poppabear_SD: [Sends a video of an adult female with brown hair and
2 only her head visible and a young female with curly dark brown hair and a pink
3 shirt that has a princess and a blue bird on it. The young female says, "Hi Tony,"
4 in the video.]

5 OCE: It's not playing on kik can usend to my email? [OCE sends a covert email
6 address]

7 Black_poppabear_SD: Nothing special

8 OCE: Is that a mother daughter vid

9 OCE: .

10 Black_poppabear_SD: How you teach to suck u

11 Black_poppabear_SD: Yes it id

12 Black_poppabear_SD: Found both those piggies online
13

14 6. That chat continues and includes Black_poppabear_SD sending two
15 different videos of a young female girl breastfeeding. The young female in both of those
16 videos appears to be the same young female pictured in the first video sent.

17 7. The chat on August 17, 2015 also included the following:

18 Black_poppabear_SD: Plan on breeding the daughter

19 OCE: Ah ok

20 OCE: Yes

21 OCE: Who was the girl in vid

22 OCE: She is hot

23 Black_poppabear_SD: The mom or dsugtger

24 Black_poppabear_SD: Daughter

25 OCE: Both

26 Black_poppabear_SD: Step daughter and gf

27 OCE: Nice !!

28 OCE: She play with her

1 Black_poppabear_SD: She's 44, she's 3 and she still breast feed her
 2 Black_poppabear_SD: Met her on fetlife
 3 OCE: Love to see more of them together, does she get nasty with her
 4 OCE: Mmm
 5 Black_poppabear_SD: She just started playing with her while she nurses
 6 OCE: Mmmm that is so hot
 7 OCE: Any more
 8 OCE: They home now
 9 Black_poppabear_SD: They live in Washington state I'm in Arizona
 10 Black_poppabear_SD: I'm moving in next summer
 11 OCE: Oh shit man can I have her kik
 12 OCE: Or more vids they play once needed to update lol
 13 Black_poppabear_SD: Mom very open to me breeding her and teaching
 14 daughter to be a good cuz slut like her
 15

16 8. The chat above continued, and the OCE asked for more images of the
 17 mother and daughter. The OCE sent an image of what appears to be a young female with
 18 exposed stomach and chest and underwear. The images are not of a real person. The
 19 images were sent to alleviate the suspicion that OCE is a law enforcement officer.
 20 Black_poppabear_SD indicates to OCE that he has more of mother and daughter to share
 21 and they agree to chat again the following day.

22 9. The chat re-initiated on August 18, 2015 and the user Black_poppabear_SD
 23 and OCE exchanged images. The images sent by Black_poppabear_SD are images or
 24 video of child pornography that are identified by OCE as having been seen before. The
 25 images sent by OCE are similar to those sent the previous day and show what appear to
 26 be a young female with underwear, stomach and chest exposed. The images sent by OCE
 27 are not of a real person. The chat on August 18, 2015 also includes the following:
 28

1 OCE: has your Gf done anything else with the lil one?

2 Black_poppabear_SD: She licks finger her

3 Black_poppabear_SD: In October she's felt. Down with her so I can break
4 her in

5
6 10. The user Black_poppabear_SD and OCE chatted on August 19, 2015 and
7 August 21, 2015. During the chats on August 21, 2015, Black_poppabear_SD sent two
8 images, the first depicts a young female's exposed buttocks with nothing else visible, the
9 second depicts a young female's exposed genital area with an adult hand spreading the
10 young female's vagina open. I have viewed this image. Based on the lack of body or
11 pubic hair, the overall size and development of the female I would estimate the young
12 female's age to be under five years old in the second image. After sending the image and
13 some other comments the following occurs in the chat:

14 Black_poppabear_SD: Those pics I just sent you are of the daughter

15 OCE: Any with her in them, such a turn on to see that

16 Black_poppabear_SD: That's her hand spreading her open
17

18 11. Later on in the day on August 21, 2015 additional chatting included the
19 following:

20 Black_poppabear_SD: [sends an image of a young female in the first video
21 sent on August 17, 2015 sleeping on what appears to be a couch or armchair. The
22 young female is fully clothed and is wearing the same shirt as the one she was
23 wearing in the first video.]

24 Black_poppabear_SD: There's my angel

25 Black_poppabear_SD: She'll be 3 in a couple of weeks

26 OCE: Damn she is so sexy

27 OCE: Is that your step

28 Black_poppabear_SD: yes

1 OCE: Nice

2 Black_poppabear_SD: She already calls me daddy

3
4 12. Later on in that chat Black_poppabear_SD stated that, "She's always been
5 an [sic] fantasy pedo mom....I just made it real for her." That chat also includes
6 Black_poppabear_SD sending three images of an adult hand touching the exposed vagina
7 of a young female. Included in each of the pictures is a piece of paper with the date "8-
8 21-15" written on it. In response to a question of what one of the images was because it
9 was hard to see, Black_poppabear_SD responds, "Moms finger in her."
10 Black_poppabear_SD also sent a video that lasts approximately 4 seconds and shows an
11 adult hand rubbing the exposed vagina of a young female. The hand and young female
12 appear to be the same across all of the images and the video that were sent on August 21,
13 2015.

14 13. An emergency disclosure request was issued to KIK for subscriber
15 information and IP address history for the account, Black_poppabear_SD. That request
16 resulted in obtaining a confirmed email address, fire_dragon77us@yahoo.com and
17 several IP addresses for the most recent activity. Through publically available databases,
18 some of the IP addresses, including 24.249.203.107, belonged to Cox Communications.
19 A phone call to Cox Communications resulted in Cox Communications verbally
20 providing the physical address of 9603 Campo Road, Spring Valley, CA 91977 being
21 associated with that IP address on August 22, 2015.

22 14. Open source searches of the email address fire_dragon77us@yahoo.com
23 resulted in finding the Facebook profile, www.facebook.com/tony.papbear, with the
24 name Tony Papabear. Publicly available information on that profile indicated that the
25 owner was originally from Louisville, KY and currently resides in San Diego, CA. An
26 emergency request was issued to Facebook for subscriber information associated with
27 that profile. That request resulted in, among other information, IP addresses owned by T-
28 Mobile. An emergency disclosure request was submitted to T-Mobile for customer

1 information associated with the IP addresses identified. That request resulted in
2 identifying the customer using the IP addresses to access Facebook as Antonio Boleware
3 with telephone number 619-577-6288.

4 15. A review of publicly available sex offender registry information identified
5 Antonio Boleware as residing at 9603 Campo Road, Spring Valley, CA. I have reviewed
6 a copy of Boleware's criminal history which includes two convictions for lewd or
7 lascivious acts with a child under the age of 14 years.

8 16. A review of the publicly available Friends list on the profile,
9 www.facebook.com/tony.papbear, showed an individual residing in Washington state
10 with the profile, www.facebook.com/joanna.olson.9. I have reviewed the publicly
11 available Facebook profile, www.facebook.com/joanna.olson.9. Included in that profile
12 are multiple images depicting children. One of those children appears to be the same
13 child depicted in the videos that were sent by the user, Black_poppabear_SD, to OCE on
14 August 17, 2015 (hereinafter Minor Victim 1). The profile also indicates that JOANNA
15 OLSON resides in Longview, WA.

16 17. A search of the Thomson Reuters CLEAR information database (a public
17 records database that provides names, dates of birth, addresses, associates, telephone
18 numbers, email addresses, etc.) and other public databases was conducted for JOANNA
19 OLSON, in Longview, WA. These public records indicated that JOANNA OLSON
20 currently resides at xxxx 18th Ave, Longview, WA 98632.

21 18. I have reviewed a Driver's License photo of JOANNA JEAN OLSON, of
22 xxx 18th Ave, Longview, WA 98632. The woman pictured in the driver's license photo
23 is the same woman depicted in the first video that was sent by the user
24 Black_poppabear_SD to OCE on August 17, 2015.

25 19. I spoke with FBI SA Daniel Evans on August 26, 2015. SA Evans advised
26 that he had obtained and executed a search warrant on Antonio Boleware's residence. At
27 the execution of the warrant, Boleware was contacted and a phone was taken from his
28 person. A search of the phone showed that the Kik application was installed on the

1 phone and that it was signed in under the user name Black_poppabear_SD. There were
2 current messages from today on the phone from JOANNA OLSON using the username,
3 mommy3boys2girls. OLSON's cell phone number was listed as 360-703-xxxx.
4 Messages received on the Kik app from OLSON today talked about OLSON coming
5 down to visit Boleware.

6 20. SA Evans further advised that he had interviewed Antonio Boleware.
7 Boleware told SA Evans that he has known JOANNA OLSON for years and that she
8 used to live in California. Boleware told SA Evans that he resets his phone regularly and
9 that this results in the history in the Kik app being cleared. Boleware admitted to SA
10 Evans that he had received pictures of OLSON touching a minor child's vagina.
11 Boleware stated that OLSON told him that the pictures were of Minor Victim 1 and that
12 the hand in the picture was hers. Boleware told SA Evans that first received videos of
13 Minor Victim 1 breastfeeding about a month ago and that the pictures and videos have
14 progressed from there to images of OLSON touching Minor Victim 1's vagina.
15 Boleware was shown a picture that showed JOANNA OLSON'S and Minor Victim 1's
16 faces and Boleware confirmed their identities as JOANNA OLSON and Minor Victim 1.
17 JOANN OLSON has been down to California to visit Boleware but she left her children
18 behind. Boleware stated he had never met Minor Victim 1 in person.

19 21. On August 26, 2015, I obtained and served a federal search warrant at
20 JOANNA OLSON's residence, xxx 18th Ave, Longview, WA. JOANNA OLSON was
21 at the residence when the search warrant was served. The search warrant included the
22 search and seizure of electronic items, including cellular telephones. During the search, a
23 cellular telephone was identified as belonging to JOANNA OLSON. A preliminary
24 search of the phone showed the KIK application was installed on the phone. In the KIK
25 application was a chat with the user Black_poppabear_SD from earlier that day.

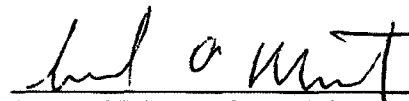
26 22. On August 26, 2015, during the search of her residence pursuant to a
27 federal search warrant, I interviewed JOANNA OLSON. JOANNA OLSON admitted to
28 taking pictures of her daughter's vagina and sending them to a man she knows as Tony

1 Boleware. According to Olson, Boleware is located in San Diego, CA and JOANNA
 2 OLSON has physically been down to visit Boleware in San Diego. Among the pictures
 3 taken by JOANNA OLSON was a picture where in JOANNA OLSON used her hand to
 4 spread open her daughter's exposed vagina. JOANNA OLSON also admitted to showing
 5 Boleware her daughter's nude buttocks during a Skype video chat one time. JOANNA
 6 OLSON stated she had taken all the pictures of her daughter using her cellular telephone
 7 and had transmitted them to Boleware through the KIK application on her cellular
 8 telephone.

9 23. The cellphone that JOANNA OLSON used to produce the images of child
 10 pornography regarding Minor Victim 1, was not manufactured in the state of
 11 Washington.

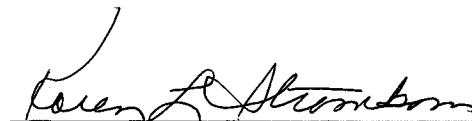
12 CONCLUSION

13 24. Based on the above facts, I respectfully submit that there is probable cause
 14 to believe that JOANNA OLSON did knowingly and unlawfully produce and possess
 15 child pornography, in violation of Title 18, United States Code, Sections 2251(a) and
 16 2252(a)(4) and (b)(2).

17 
 18 Samuel Mautz, Complainant
 19 Special Agent, FBI

20 The above named agent provided a sworn statement attesting to the truth of the
 21 content of the foregoing Complaint and Affidavit on 27th day of August, 2015. Based on
 22 this Complaint and Affidavit, the Court hereby finds that there is probable cause to
 23 believe the Defendant committed the offenses set forth in the Complaint.

24 Dated this 27th day of August, 2015.

25 
 26 KAREN L. STROMBOM
 27 United States Magistrate Judge
 28